

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

SANDY J. BATTISTA,  
Plaintiff,

vs.

KATHLEEN M. DENNEHY, Comm'r, et al.,  
Defendant's.

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C.A.No.05-11456-DPW

PLAINTIFF'S MOTION FOR LEAVE TO FILE A REPLY TO OPPOSITION OF  
DEFENDANTS KATHLEEN M. DENNEHY, ROBERT MURPHY, SUSAN MARTIN,  
STEVEN FAIRLY AND GREGORY HUGHES TO PLAINTIFF'S  
REQUEST FOR A PRELIMINARY INJUNCTION

Plaintiff, Sandy J. Battista, acting pro-se in the above captioned matter, respectfully request leave to file a Reply to the Opposition of Defendants Kathleen M. Dennehy, Robert Murphy, Susan Martin, Steven Fairly and Gregory Hughes to her pending Application for a Temporary Restraining Order, and/or in the Alternative, for a Preliminary Injunction. As grounds for this Motion, Plaintiff states that Defendant's Opposition at issue is obfuscatory and contains additional facts and circumstances, as well as advances an affirmative defense under the doctrine of res judicata, and that further clarification is necessary for this Court's complete consideration of Plaintiff's Request for Preliminary Injunctive Relief.

Plaintiff further request that this Court enlarge the time period in which she would be required to file such a Reply, up to and including the date of August 15, 2005. Copies of the enclosed Motion, as well as Plaintiff's Reply will be served upon Defendant's such that they will not be prejudiced by an allowance of

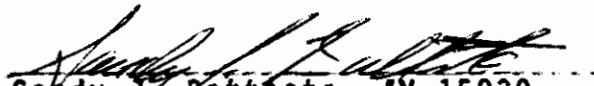
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this Motion.

WHEREFORE, Plaintiff respectfully request this Court grant her leave to file a Reply to the Defendant's Opposition at issue, as well as granting her the additional time sought herein in which she would be required to file such a Reply.

Dated: July 27, 2005.

Respectfully submitted,

  
Sandy J. Battista, #M-15930  
Plaintiff/Pro-se  
Mass. Treatment Center  
30 Administration Rd.  
Bridgewater, Mass. 02324-3230

CERTIFICATE OF SERVICE

I, Sandy J. Battista, plaintiff in the enclosed matter, acting pro-se, under oath, hereby certify's that I have today mailed a true and accurate copy of the within document upon counsel of record for the above-named defendant's, as well as upon defendant UMass. Corr. Health Program, separately, whom has yet to make an appearance in this action, via first class mail, postage prepaid, by hand/mail.

Dated: July 27, 2005.

  
Sandy J. Battista, #M-15930  
Plaintiff/Pro-se